

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

**In re:**

<b>JAYME ANN LIVORIO</b>	)	<b>Case No. 20-22212-TPA</b>
	)	
<b>Debtor.</b>	)	<b>Chapter 7</b>
	)	
	)	<b>Document No. ____</b>
<b>JEFFREY J. SIKIRICA,</b>	)	
<b>CHAPTER 7 TRUSTEE</b>	)	
	)	
<b>Movant</b>	)	
	)	
<b>vs.</b>	)	
	)	
<b>JAYME ANN LIVORIO</b>	)	
	)	
<b>Respondent.</b>	)	

**MOTION FOR AUTHORITY TO CONSENT  
TO A SHORT SALE OF REAL PROPERTY**

AND NOW, comes, Jeffrey J. Sikirica, Trustee (hereinafter “Livorio Trustee”) for the Bankruptcy Estate of Jayme Ann Livorio (hereinafter “Debtor”) and files this “Motion for Authority to Consent to a Short Sale of Real Property”, stating in support thereof as follows:

1. The Debtor is a co-owner of real estate in which she no longer resides, with Richard P. Barnes, II.
2. The real estate is located at 113 Treona Drive, Verona, PA 15147 (hereinafter the “Real Estate”).
3. The Real Estate is worth less than the mortgage secured by it and it is subject to a foreclosure and sheriff sale which is temporarily stayed.
4. On November 15, 2018, Richard P. Barnes, II filed a voluntary petition under chapter 13 of the Bankruptcy Code at Bankruptcy Case No. 18-24483-GLT, which case was

converted to a case under chapter 7 on August 17, 2020 (hereinafter the “Barnes Estate”).

5. Natalie Lutz Cardiello (hereinafter “Trustee Cardiello”) is the appointed Trustee of the Barnes Estate.
6. On October 28, 2020, Trustee Cardiello filed an Application to employ BK Global Real Estate Services (hereafter “BKG”) and EXP Realty to negotiate a short sale of the Real Estate, which Application was approved on November 30, 2020.
7. On February 3, 2021, Trustee Cardiello entered into a contract to sell the Real Estate for \$102,500, plus a buyer’s premium of \$7,500.00<sup>1</sup>.
8. In exchange for the Livorio Trustee consenting to a sale of the Real Estate, Trustee Cardiello has agree to split the \$7,500.00 buyer’s premium equally between the Barnes Estate and the Debtor’s Bankruptcy Estate.
9. The buyer’s premium received by the Bankruptcy Estate will only be for the benefit of administrative and unsecured claims and not subject to any exemption claim of the Debtor since there is no equity in the Real Estate.
10. The deadline to file claims has passed with a total of \$4,758.04 in unsecured claim being filed.
11. The \$3,750.00 received as a buyer’s premium will still result in a meaningful distribution to the creditors that have filed claims.

WHEREFORE, the Livorio Trustee respectfully prays this Honorable Court to enter an

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<sup>1</sup> After Trustee Cardiello and the prospective purchaser entered into the sales agreement, it was discovered that the sewer lines needed to be replaced. The sale price was subsequently increased to \$111,000 and a contingency added requiring that the sewer lines be repaired per the sewage authority and county requirements prior to closing. Trustee Cardiello has not yet received confirmation that the servicer/investor will agree to the repair but anticipates that a satisfactory result can be reached.

Order authorizing him to consent to a short sale motion to be brought by Trustee Cardiello in the bankruptcy case of Richard P. Barnes, II filed at Case No. 18-24483-GLT.

Respectfully submitted,

Dated: 06/10/21

/s/ Jeffrey J. Sikirica  
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**TRUSTEE FOR DEBTOR**